

## The complaint

Mr H has complained about a transfer of his Utmost Life and Pensions Limited ('Utmost') personal pension to a small self-administered scheme ('SSAS') in October 2017. Mr H's SSAS was subsequently used to invest in Dolphin Capital ('Dolphin'), a loan note investment in property in Germany. The investment now appears to have little value. Mr H says he has lost out financially as a result.

Mr H says Utmost failed in its responsibilities when dealing with the transfer request. He says that it should have done more to warn him of the potential dangers of transferring, and undertaken greater due diligence on the transfer, in line with the guidance he says was required of transferring schemes at the time. Mr H says he wouldn't have transferred, and therefore wouldn't have put his pension savings at risk, if Utmost had acted as it should have done.

## What happened

Mr H's personal pension policy was initially held with Equitable Life. Since the events his complaint concerns took place, Equitable Life policies like Mr H's have been transferred to Utmost. For ease I shall only refer to Utmost throughout this decision.

Mr H has said he was introduced to The Landlords Pension ('TLP') by a third party and subsequently had meetings with a representative of TLP who I'll call 'Mr L.' He understood TLP aimed to introduce landlords like him to suitable investments for their pensions.

Mr H says he was attracted by the prospect of a guaranteed high rate of return on his pension. He's said his existing pension "*wasn't doing anything*" and he had considered using his pension to invest in commercial property, but plans for that fell through.

At the time, Mr H has said he was employed as an IT Support Technician and was an inexperienced and unsophisticated investor with respect to overseas investments in a SSAS. Mr H was also the Director of a company that owned some rental properties. I'll refer to that company as 'Business D.'

On 3 July 2017, Mr H signed documents to open a SSAS with Whitehall Group (UK) Limited ('Whitehall'). Business D was recorded as the SSAS's principal employer. The SSAS documents included no mention of what the SSAS was to be used to invest in. One of the documents – the SSAS Trust Deed – was also signed by Mr L as a witness to Mr H's signature. Mr L's occupation was recorded as "*Investment broker.*"

On 25 September 2017, Mr H's transfer papers were sent to Utmost by Whitehall by post. Included in the transfer papers was a 'Transfer Discharge Instruction' form that was signed by Mr H and completed with the details of the SSAS.

On 3 October 2017, Utmost wrote to Mr H explaining that, amongst other things, he should consider checking the Financial Conduct Authority's ('FCA') website listing known scams before proceeding, and that he may also want to consider consulting an Independent Financial Adviser. The letter referred to a number of enclosures with it, including a "*pension scams leaflet*."

On 5 October 2017, Mr H signed a 'Transfer Payment Form' confirming his instruction to Utmost to proceed with the transfer. The relevant boxes were ticked on the form to confirm Mr H had "*read and understood the leaflet produced by The Pensions Regulator on investment scams*" and that he had received guidance or advice from Pension Wise and a regulated financial adviser. The section of the form for the adviser's details was left blank.

Mr H's pension was transferred on 10 October 2017. His transfer value was around £48,000. He was 52 years old at the time of the transfer.

Mr H went on to invest £45,000 in a Dolphin loan note in April 2018. As I understand it, the loan note had a 10% per annum fixed interest rate that was payable when it matured in 2020.

As I understand it, Mr H didn't receive any interest payment and Dolphin entered into preliminary bankruptcy proceedings in Germany in October 2020. Investors are very unlikely to receive any of their investment back, and as such, Mr H's Dolphin investment has no realisable value.

In November 2021, Mr H complained to Utmost via a representative. Briefly, his argument is that Utmost failed to carry out sufficient due diligence on his transfer and inform him of the warning signs it ought to have identified. He also argued that Utmost failed to provide him with any materials warning of the risks around potential fraud, scams and pension liberation.

Utmost didn't uphold the complaint. It said Whitehall wasn't on its watchlist of high risk companies, and it sent Mr H leaflets from the Pensions Advisory Service ('TPAS') and The Pensions Regulator ('TPR') warning of the risks of scams besides a recommendation to get independent advice. It said Mr H confirmed he had read and understood TPR's leaflet and that he had received guidance from Pension Wise, and that none of the information it had about the transfer at the time gave it cause for concern. Ultimately, it was satisfied it had conducted an appropriate level of due diligence given the requirements of the time, and had acted properly in complying with Mr H's transfer instructions.

Our Investigator was unable to resolve the dispute informally, so the matter was passed to me to decide.

### **Provisional decision**

I recently issued a provisional decision on Mr H's complaint explaining that I did not intend to uphold it, and I provided him and Utmost with the opportunity to make any further submissions before I reached my final decision. Mr H made the following points in response:

- Utmost seemed eager to settle his account with very few questions raised or warnings given.
- He cannot find any record of receiving the Scorpion insert and there's no date as to when this was sent to him. He questioned if there was evidence that he had received it, such as a signed for receipt from the Post Office.

Our Investigator sent Mr H a copy of the Transfer Payment Form and Utmost's October 2017 letter to him, and they asked him if he had any additional comments further to reviewing those documents. Mr H did not respond.

Utmost confirmed it had nothing further to add and it accepted my provisional decision.

I'll address Mr H's response to my provisional decision in my findings below.

### **What I've decided – and why**

I've considered all the available evidence and arguments to decide what's fair and reasonable in the circumstances of this complaint.

When considering what is fair and reasonable, I am required to take into account: relevant law and regulations; regulators' rules, guidance and standards; codes of practice; and, where appropriate, what I consider to have been good industry practice at the relevant time.

Where the evidence is incomplete, inconclusive, or contradictory, I've reached my conclusions on the balance of probabilities – that is, what I think is more likely than not to have happened based on the available evidence, and the wider surrounding circumstances.

### The relevant rules and guidance

Personal pension providers are regulated by the FCA. Prior to that they were regulated by the FCA's predecessor, the Financial Services Authority ('FSA'). As such Utmost was subject to the FSA/FCA Handbook, and under that to the Principles for Businesses ('PRIN') and to the Conduct of Business Sourcebook ('COBS'). There have never been any specific FSA/FCA rules governing how personal pension providers deal with pension transfer requests, but the following have particular relevance here:

- Principle 2 – A firm must conduct its business with due skill, care and diligence;
- Principle 6 – A firm must pay due regard to the interests of its customers and treat them fairly;
- Principle 7 – A firm must pay due regard to the information needs of its clients, and communicate information to them in a way which is clear, fair and not misleading; and
- COBS 2.1.1R (the client's best interests rule), which states that a firm must act honestly, fairly and professionally in accordance with the best interests of its client.

In February 2013, TPR issued its Scorpion guidance to help tackle the increasing problem of pension liberation. In brief, the guidance, which was endorsed by the FSA, provided a due diligence framework for ceding schemes dealing with pension transfer requests and some consumer-facing warning materials designed to allow members to decide for themselves the risks they were running when considering a transfer.

The Scorpion guidance was described as a cross-government initiative by Action Fraud, The City of London Police, HMRC, TPAS, TPR, the Serious Fraud Office, and the FSA/FCA, all of which endorsed the guidance, allowing their names and logos to appear in Scorpion materials.

The FSA's endorsement of the Scorpion guidance was relatively informal: it didn't take the form of Handbook Guidance, because it was not issued under s.139A of the Financial Services and Markets Act 2000, which enabled the FSA to issue guidance provided it underwent a consultation process first. Nor did it constitute 'confirmed industry guidance,' as can be seen by consulting the list of all such FSA/FCA guidance on its website. So the content of the Scorpion guidance was essentially informational and advisory in nature. Deviating from it doesn't therefore mean a firm has necessarily broken the Principles or COBS rules. Firms were able to take a proportionate approach to transfer requests, balancing consumer protection with the need to also execute a transfer promptly and in line with a member's right to transfer.

That said, the launch of the Scorpion guidance in 2013 was an important moment in so far as it provided, for the first time, guidance for personal pension providers dealing with transfer requests – guidance that prompted providers to take a more active role in assessing those requests. The guidance was launched in response to widespread abuses that were causing pension scheme members to suffer significant losses. And the guidance's specific purpose was to inform and help ceding firms when they dealt with transfer requests in order to prevent these abuses and save their customers from falling victim to them.

In those circumstances, I consider firms which received pension transfer requests needed to pay regard to the contents of the Scorpion guidance as a matter of good industry practice. It means February 2013 marks an inflection point in terms of what was expected of personal pension providers dealing with transfer requests as a matter of fulfilling their duties under the regulator's Principles and COBS 2.1.1R.

The Scorpion guidance was updated in July 2014. It widened the focus from pension liberation specifically, to pension scams more generally – which included situations where someone transferred in order to benefit from *"too good to be true"* investment opportunities such as overseas property developments. An example of this was given in one of the action pack's case studies.

In a similar vein, in April 2014 the FCA had also started to voice concerns about the different types of pension arrangements that were being used to facilitate pensions scams. In an announcement to consumers entitled 'Protect Your Pension Pot' the increase in the use of SIPP and SSAs in pensions scams was highlighted, as was an increase in the use of unregulated and/or illiquid investments. The FCA further published its own factsheet for consumers in late August 2014. It highlighted the announcement to insurers and advisers in a regulatory round-up published on its website in September 2014.

In 2015, a broader piece of guidance was initiated by an industry working group covering both TPR and FCA regulated firms: the Pension Scams Industry Group ('PSIG') Code of Good Practice. The intention of the PSIG Code was to help firms achieve the aims of the Scorpion campaign in a streamlined way which balanced the need to process transfers promptly with the need to identify those customers at material risk of scams.

There were further regular updates to the Scorpion guidance over the years. I take the view that the member-facing Scorpion warning materials were to be used in much the same way as previously, which is for the shorter insert (which had been refreshed in March 2017) to be sent when someone requested a transfer pack and the longer version (which had been refreshed in 2016) made available when members sought further information on the subject.

## The PSIG Code of Good Practice

The PSIG Code was voluntary. But, in its own words, it set a standard for dealing with transfer requests from UK registered pension schemes. It was “welcomed” by the FCA and the Association of British Insurers (amongst others). And several FCA regulated pension providers were part of the PSIG and co-authored the Code. So much of the observations I’ve made about the status of the Scorpion guidance would, by extension, apply to the PSIG Code. In other words, personal pension providers didn’t necessarily have to follow it in its entirety in every transfer request and failure to do so wouldn’t necessarily be a breach of the regulator’s Principles or COBS. Nevertheless, the Code sets an additional benchmark of good industry practice in addition to the Scorpion guidance.

In brief, the PSIG Code asked schemes to send the Scorpion ‘materials’ in transfer packs and statements, and make them available on websites where applicable. The PSIG Code goes on to say those materials should be sent to scheme members directly, rather than just to their advisers.

Like the Scorpion guidance, the PSIG Code also outlined a due diligence process for ceding schemes to follow. However, whilst there is considerable overlap between the Scorpion guidance and the PSIG Code, there are several differences worth highlighting here, such as:

- The PSIG Code includes an observation that: “*A strong first signal of [a scam] would be a letter of authority requesting a company not authorised by FCA to obtain the required pension information; e.g. a transfer value, etc.*” This is a departure from the Scorpion guidance (including the 2016 and 2017 guidance) which was silent on whether anything could be read into the entity seeking information on a person’s pension.
- The Code makes explicit reference to the need for scheme administrators to keep up to date with the latest pension scams and to use that knowledge to inform due diligence processes. Attention is drawn to FCA alerts in this area. (I noted the contents of some of those alerts earlier in my decision.)
- Under the PSIG Code, an ‘initial analysis’ stage allows transferring schemes to fast-track a transfer request without the need for further detailed due diligence, providing certain conditions are met. No such triage process exists in the 2017 Scorpion guidance – following a three-part due diligence checklist it set out was expected whenever a transfer was requested.
- The PSIG Code splits its later due diligence process by receiving scheme type: larger occupational pension schemes, SIPP, SSASs and QROPS. The 2017 Scorpion guidance doesn’t distinguish between receiving scheme in this way – there’s just the one due diligence checklist which is largely (apart from a few questions) the same whatever the destination scheme.

TPR began referring to the Code as soon as it was published, in the March 2015 version of the Scorpion action pack. Likewise, the PSIG Code referenced the Scorpion guidance and indicated staff dealing with scheme members needed to be aware of the Scorpion materials.

Therefore, in order to act in the consumer's best interests and to play an active part in trying to protect customers from scams, I think it's fair and reasonable to expect ceding schemes to have paid due regard to both the Scorpion guidance and the PSIG Code when processing transfer requests. Where one differed from the other, they needed to consider carefully how to assess a transfer request taking into account the interests of the transferring member. Typically, I'd consider the Code to have been a reasonable starting point for most ceding schemes because it provided more detailed guidance on how to go about further due diligence, including steps to potentially fast-track some transfers which – where appropriate – would be in the interest of both parties.

The considerations of regulated firms didn't start and end with the Scorpion guidance and the PSIG Code. If a personal pension provider had good reason to think the transferring member was being scammed – even if the suspected scam didn't involve anything specifically referred to in either the Scorpion guidance or the Code – then its general duties to its customer as an authorised financial services provider would come into play and it would have needed to act. Ignoring clear signs of a scam, if they came to a firm's attention, or should have done so, would almost certainly breach the regulator's principles and COBS 2.1.1R.

#### The circumstances surrounding the transfer: what does the evidence suggest happened?

I set out above the chain of events that led to the transfer of Mr H's pension based on the documents that have been provided. I won't repeat all of that here, but I will refer to that documentation where necessary.

In addition to the documentary evidence, Mr H spoke to our Investigator at some length about the transfer. Mr H told our Investigator that he had considered using his pension to invest in commercial property, but those plans fell through. He said a property related networking group he was a member of introduced him to TLP, and he had also come across them at meetings for individuals with an interest in property where they had given presentations. He said TLP presented themselves as introducers of investments that were suitable for pensions, and they connected him to Whitehall and the Dolphin investment.

Mr H has been consistent throughout his submissions about how he came into contact with TLP. What he told our Investigator about the consideration he'd previously given to transferring his pension appears to be supported by evidence we've received from Utmost. It's provided a call note that documents a call Mr H made to Utmost in May 2016 that appears to relate to transferring his pension. Additionally, the name of the representative of TLP that Mr H says he dealt with matches the name of the witness on the SSAS Trust Deed. Based on all of that, I've found the transfer of Mr H's pension to the SSAS came about further to his dealings with TLP.

Mr H has also been consistent in his submissions that the appeal of the transfer and the subsequent investment was the promise of a 10% per annum return. He told our Investigator he looked into the scheme and found other people had invested in it, so it seemed to be a good scheme to go for. He also said he was reassured about the Dolphin investment by someone he understood was a friend of the owners of TLP. In the context of Mr H's view that his Utmost pension "*wasn't doing anything*" and the confidence he established in the investment, I think the promise of such a return appealed strongly to him. Mr H has maintained throughout that he didn't receive any monetary payment for transferring his pension and no evidence has been provided that suggests he did. So, I consider Mr H's motivation for transferring was accessing a significantly higher return in his pension than what he thought he was getting.

As I noted above, it seems Mr H had already considered transferring his pension before this transfer took place. He's said he had previously considered using his pension to invest in commercial property (without elaborating on what sort of pension arrangement he planned to use to facilitate that). That appear to be in keeping with Mr H's experience of investing in rental properties through Business D.

The pension arrangement Mr H transferred to and the subsequent investment he made in a Dolphin loan note were complex and unusual. I consider that was significantly different to what he had previously planned to do and his experience of investing in property. Therefore I also consider that it was unlikely he decided to enter into this arrangement on his own.

The evidence is that Mr H's dealings were principally with Mr L of TLP, who's occupation was described on the SSAS Trust Deed as "*Investment Broker*." Mr H recalled to our Investigator that he met Mr L on two occasions to discuss the transfer and exchange the paperwork to facilitate it. He said he was introduced to Whitehall and the Dolphin investment by TLP. Based on the evidence provided I'm satisfied this is what happened here.

#### What did Utmost do and was it enough?

##### *The Scorpion insert:*

For the reasons given above, my view is that personal pension providers should, as a matter of course, have sent transferring members the Scorpion insert or given them substantially the same information.

Mr H maintains he wasn't given any material warning him about pension scams. He says he can't find any record of receiving the Scorpion insert. He hasn't recalled interacting with Utmost about the transfer, although he's said Utmost seemed eager to complete the transfer. The events concerned took place a number of years ago and I'm mindful that recollections can fade over time and documents can be lost. The documentary evidence from the time is that Utmost mainly communicated with Whitehall about the transfer, except for its October 2017 letter to Mr H. From what I can see (the copy of the letter provided to us is partially obscured), that letter was addressed to Mr H and clearly referred to an enclosed "*Pension scams leaflet*." Utmost say that letter was dated 3 October 2017. Mr H signed the 'Transfer Payment Form' on 5 October 2017, and he indicated on the form that he had "*read and understood the leaflet produced by [TPR] on investment scams*."

So I think it's likely that Mr H had received Utmost's letter by the time he signed that form. Based on what I've seen I've decided that leaflet was likely the March 2017 Scorpion leaflet, and I've decided it was sent to Mr H with Utmost's October 2017 letter. That's because the contemporaneous evidence is that Mr H had read and understood a leaflet produced by TPR about scams.

##### *Due diligence:*

As explained above, I consider the PSIG Code to have been a reasonable starting point for most ceding schemes. I've therefore considered Mr H's transfer in that light. But I don't think it would make a difference to the outcome of the complaint if I had considered Utmost's actions using the Scorpion guidance as a benchmark instead.

Utmost says it operated a watchlist of high risk companies and that Whitehall didn't appear on that list at the time of Mr H's transfer, and the information Whitehall provided it with demonstrated the authenticity of the scheme. The evidence is that Utmost's due diligence on the transfer did not go beyond that. Utmost also says that at the time of the transfer there was no requirement to make further investigations into the relationship between the Scheme and the Individual.

It seems to me that Utmost essentially fast tracked Mr H's transfer in line with section 6.2.1 of the Code on the basis that it had identified Whitehall as being free from scam risk. Utmost says Whitehall wasn't on their "*watchlist*" of high risk companies which they updated based on FCA notifications. The Code (Section 6.11) provides guidance to ceding schemes on the key considerations in building a list of administrators or schemes that do or do not present a risk of a scam. However, Utmost hasn't provided any evidence that it took those key considerations into account in respect of Whitehall. I appreciate it might not have been identified as a high risk company, however Utmost hasn't demonstrated how they established it was free from scam risk to the point where no further due diligence would be needed.

With that in mind and the limited information Utmost had about Mr H's transfer, Utmost could not have reasonably considered the receiving scheme/administrator as being free of scam risk in my view. So the initial triage process should have instead led to Utmost asking Mr H further questions about the transfer as per Section 6.2.2 ('Initial analysis – member questions'). I won't repeat the list of suggested questions in full. Suffice to say, at least two of them would have been answered "yes:"

- Have you been promised a specific/guaranteed rate of return?
- Have you been informed of an overseas investment opportunity?

Under the Code, further investigation should follow a "yes" to any question. The nature of that investigation depends on the type of scheme being transferred to. The SSAS section of the Code (Section 6.4.3) points to the following as being potential areas of concern:

- a) Employment link: a lack of an employment link to any member of the SSAS.
- b) Geographical link: a sponsoring employer that is geographically distant from the member.
- c) Marketing methods: a SSAS being marketed through a cold call or an unsolicited approach.
- d) Provenance of receiving scheme: a SSAS registered within the previous six months or a recently registered sponsoring employer or administrator operating from 'virtual' offices, or using PO Boxes for correspondence purposes.

Underneath each area of concern, the Code set out a series of example questions to help scheme administrators assess the potential risk facing a transferring member.



Not every question would need to be addressed under the Code. Indeed, the Code makes the point that it is for scheme administrators to choose the most relevant questions to ask (including asking questions *not* on the list if appropriate). But the Code makes the point that a transferring scheme would typically need to conduct investigations into a “*wide range*” of issues to establish whether a scam was a realistic threat. With that in mind, and given the relatively limited information it had about the transfer, I think in this case Utmost reasonably should have addressed all four sections of the SSAS due diligence process and contacted Mr H to help with that.

#### What should Utmost have found out – and would it have made a difference?

Utmost would have known from the information provided to it by Whitehall that the SSAS had been established less than six months prior to the transfer request, and registered with HMRC only four days prior to the request. It would also have known Business D was the sponsoring employer and that Mr H was a Director of the business. A search of the Companies House register would have revealed to Utmost that Business D had been incorporated some time ago, and was an active property related business that was initially registered at the same address as Mr H’s personal address at the time. I think that would have satisfied Utmost that there was an employment and geographical link between Mr H and Business D.

Investigations under part (c) of the Code would have led Utmost to discover the involvement of TLP in the transfer, albeit not via a method the Code said might indicate there was a scam risk. If Utmost had contacted Mr H to find out how he’d become aware of the proposed scheme, I think it would have discovered: Mr H wasn’t cold called; TLP had given him information about Whitehall and Dolphin; and, he had been persuaded to transfer by the guaranteed high returns the investment offered and the confidence he’d established in it.

Utmost should have queried who Mr H’s regulated adviser was. The ‘Transfer Payment Form’ it received prior to executing the transfer indicated Mr H had received regulated advice about the transfer. But no details were given about the adviser who had given that advice. Mr H has said he understood TLP to be introducers of investments that were suitable for pensions, and from how he has described the interactions with TLP I’m not persuaded that he thought he was getting advice. Even though he ticked a box to say he had received regulated advice, there is no evidence that points to the involvement of a regulated adviser. So, if Utmost had sought clarification from Mr H about TLP’s involvement in the matter, I think it’s more likely than not Mr H would have said he hadn’t received advice about his pension transfer.

There were warning signs present in the transfer. But further due diligence would have shown that the SSAS had a genuine employment link and Mr H hadn’t been cold called or been advised by an unregulated party to transfer his pension which would have reasonably decreased any concerns this would be a scam. And any warnings about guaranteed returns, overseas investment and the importance of regulated advice had already been provided in the form of the Scorpion insert.

So I don’t think any further due diligence would have led to additional warnings to the ones Utmost had already provided within the Scorpion materials.

It's apparent from what Mr H has told us about his circumstances at the time, and from Utmost's records of its contact with him, that he was interested in transferring his pension and investing it in property before he engaged TLP. Furthermore, he had come across TLP before at meetings he'd attended where they had given presentations. It also appears from what Mr H has told us that he had established some confidence in the investment from his own research and conversations he had with other people besides TLP. So whilst different from what he had initially planned to do, I think the transfer and investment TLP proposed would have appealed strongly to Mr H.

Mr H said in his complaint that if Utmost had informed him of the warning signs relating to his transfer, he would have heeded those warnings and decided not to proceed. The warning signs that I've found Utmost should have informed him of were clearly set out in the March 2017 Scorpion leaflet. The leaflet warned of *"unregulated investments offering 'guaranteed returns.' These include exotic sounding investments...and deals where your money is all in one place – and therefore more at risk."* It encouraged scheme members not to be rushed into making a decision and to take time to come to a decision.

In the section titled 'What do you need to look out for,' the leaflet said *"if you're thinking of transferring your pension, ask yourself these questions, and call TPAS on [TPAS's telephone number] if you have any doubts."* These included:

- *"Is the firm or individual FCA registered? And are they authorised to give advice on pensions?"*
- *"Are you being offered guaranteed returns?"*
- *"Are the investments regulated by the FCA?"*

It also warned to be careful about convincing brochures and materials, and to do research into any investments or pension schemes. And it warned about unregulated investments overseas or deals to put all money in one place. Mr H was planning to invest his whole pension into one investment with guaranteed returns and was investing in loan notes backed on overseas property. So, the contents of the leaflet should have resonated strongly with Mr H and put him on notice that there were potential warning signs of a scam in his transfer.

It seems Mr H may have had some doubts about proceeding with the Dolphin investment after Utmost had transferred his pension to the SSAS. Our Investigator asked him about the delay in making the investment following the transfer. Mr H suggested he may have had doubts about investing all of his pension in one place. He recalled querying this with Mr L, who told him not to worry as he only had a small pension, so it'd be better to put it all in one place as the return is quite high. He also recalled being reassured about the investment by a third party who he understood was a friend of the owners of TLP. So despite what he would have known from the Scorpion leaflet and the doubts he may have had, he ultimately wasn't deterred from transferring and making the subsequent investment.

I sympathise with the position Mr H now finds himself in and that these events are difficult for him to look back on. I also appreciate he may now view those events in a different light to what he did at the time. But in determining whether further actions from Utmost would have led to him taking a different course of action, I must consider the circumstances at the time.

Utmost should have asked more questions about the transfer. But further due diligence would not have reasonably led them to give additional warnings to the ones Mr H had already received and which didn't lead him to change his mind on the transfer.

So I don't think Utmost's failures have caused Mr H's losses.

### **My final decision**

For the reasons I've explained, I don't uphold Mr H's complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr H to accept or reject my decision before 11 February 2025.

Asa Burnett  
**Ombudsman**